

**Draft Environmental Impact Statement for EA-18G “Growler” Airfield
Operations at Naval Air Station Whidbey Island Complex**

January, 2017 Comments

Fill in and mail with comments to:

EA-18G EIS Project Manager
NAVFAC Atlantic Attn: Code EV21/SS
6506 Hampton Blvd.
Norfolk, VA 23508

1. First Name _____

2. Last Name _____

3. Organization/Affiliation _____

4. City, State, ZIP _____

5. E-mail _____

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Note: For Draft EIS page citations and supporting references see www.QuietSkies.info

1. The Growler is known for its intense low frequency engine rumble, but low frequency noise impacts are ignored in the Draft.

Action: Evaluate impacts of the Growler at low frequencies using C-weighting (dBC) in addition to A-weighting (dBA).

2. Analysis of noise impacts in the Draft is based solely on computer simulation. To be valid for decision making, models must be verified.

Action: Provide the data used for simulation. Provide Growler noise measurements with afterburners at 100 feet behind the jet in one-third octave bands from 6 Hz to 20 kHz. Calibrate the computer model with actual noise measurements in locations throughout the region.

3. NOISEMAP is the computer model used in the Draft to predict noise impacts. A Department of Defense report found that NOISEMAP is outdated and new software was needed to provide “scientifically and legally defensible noise assessments” of the modern, high-thrust jet engines used in the Growlers.

Action: Redo the noise simulation using the more recent Advanced Acoustic Model.

4. The annual Day-Night Noise Level (DNL) metric used in the Draft was developed for commercial airports that operate 365 days a year. DNL is inappropriate for the intermittent but intensive military flight activity at NASWI. Averaging over the year assumes, without studies, that the quiet days mitigate the noisy days.

Action: Noise levels should only be averaged over active flying days.

5. The Draft dismisses long-term health impacts of jet noise because some studies are not conclusive.

Action: Recognize the health impacts of Growler noise on health as documented in the World Health Organization "Guidelines on Community Noise" and "Night Noise Guidelines for Europe."

6. The Draft includes some independent noise measurements and ignores others.

Action: Incorporate the San Juan County noise reports and the Coupeville noise measurements performed by JGL Acoustics into the EIS analysis.

7. The Draft suggests that the lands and waters of the San Juan Islands (SJI) National Monument are exempt from National Environmental Policy Act (NEPA) protection. Protection was granted prior to the establishment of the SJI National Monument.

Action: Evaluate impacts of the Alternatives on the SJI National Monument and remove language stating that the Monument is exempt from NEPA.

8. The three Alternatives considered in the Draft are very similar and are based on old technology – a piloted jet that requires constant pilot training for safe carrier landing.

Action: Evaluate a new Alternative that deploys UCLASS jets (drones) instead of more Growlers to significantly reduce the need for land-based carrier training.

9. The Draft only examines socioeconomic impacts on Island and Skagit Counties. San Juan, Jefferson and Clallam Counties are or will be impacted by Growler noise. They are very dependent on outdoor recreation that is being harmed by Growler flight activity and receive little, if any, economic benefit from employment associated with NASWI.

Action: Examine socioeconomic impacts, including real estate values, on San Juan, Jefferson and Clallam Counties.

10. All Alternatives in the Draft are irrevocable decisions to add 35 or 36 Growlers at NASWI. While some potential noise Mitigation Measures addressed, there is no commitment.

Action: Commit to noise Mitigation Measures and their timelines in the Final EIS and Record of Decision.

11. The Draft EIS analysis is deficient in numerous areas. CEQ Regulation 1502.9 (a) states “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.”

Action: Supplement the EIS to address deficiencies identified in comments and offer further opportunity for public comment before the Final EIS is prepared.

12. Add your own comments here:
